

Exhibit 23

1 VERONICA BESMER, ESQ. (SBN 246560)
2 BESMER LAW FIRM
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Los Angeles, CA 90046
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4 *Counsel for Indirect Purchaser Plaintiffs*
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10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**
12 **SAN FRANCISCO DIVISION**

13 **IN RE: CATHODE RAY TUBE (CRT)**
14 **ANTITRUST LITIGATION**

Case No. 3:07-cv-5944
MDL No. 1917

15 **CLASS ACTION**

16 This Document Relates to:
17 All Indirect Purchaser Actions
18

**DECLARATION OF VERONICA BESMER
IN SUPPORT OF PLAINTIFFS'
APPLICATION FOR ATTORNEYS' FEES,
EXPENSES AND INCENTIVE AWARDS**

Judge: Honorable Samuel Conti
Courtroom One, 17th Floor

1 I, Veronica Besmer, declare as follows:

2 1. I am an attorney licensed to practice before the courts of the Northern District of
3 California, the Central District of California, and the Eastern District of California, and am the
4 founding attorney of the law firm Besmer Law. I have personal knowledge of the facts stated in
5 this declaration and, if called as a witness, I could and would testify competently to them. I make
6 this declaration in support of my firm's request for attorneys' fees, as set forth in Plaintiffs'
7 Application for Attorneys' Fees, Expenses and Incentive Awards.

8 2. My firm is counsel of record in this case, and represents named plaintiff(s) Jeffrey
9 Figone. A brief description of my firm is attached as Exhibit 1 and incorporated herein by
10 reference.

11 3. Throughout the course of this litigation, my firm kept files contemporaneously
12 documenting all time spent, including tasks performed, and expenses incurred, and transmitted
13 those reports on a regular basis to Lead Counsel. All of the time and expenses reported by my firm
14 were incurred for the benefit of the Indirect Purchaser Plaintiffs ("IPPs").

15 4. During the course of this litigation, my firm has been involved in the following
16 tasks and activities on behalf of the IPPs. All of this work was assigned and/or approved by Lead
17 Counsel. My firm performed legal research and drafted memoranda on critical issues in the case
18 such as withdrawal, the statute of limitations and its tolling in case of fraudulent concealment,
19 corporate separateness, the FTAIA and numerous discovery issues. I researched and drafted
20 liability memoranda for several defendants including Philips, BMCC, MTPD and LPD, and
21 summarized the evidence on the corporate relationships between the parent companies and their
22 joint ventures. I propounded discovery to multiple defendants on ownership and control, handled
23 the corresponding meet and confer process and a motion to compel against Toshiba. My firm also
24 participated in drafting the Omnibus motion to compel, the IPPs' opposition to Toshiba's motion
25 for summary judgment concerning withdrawal, and provided support for other motions. I also
26 attended three depositions on behalf of the IPPs and drafted summaries for Lead Counsel. Other
27 assignments during discovery included drafting deposition summaries and reviewing documents in
28

preparation for numerous depositions. To prepare for trial, I summarized the authentication of documents on IPP's trial exhibit list, prepared objections to defendants' trial exhibit lists, helped with deposition designations, and summarized prior trial transcripts involving the same defendants in the *LCD* case. Overall, my firm performed many important tasks on behalf of the class in support of the prosecution of this case.

5. The schedule attached as Exhibit 2, and incorporated herein, is a detailed summary of the amount of time spent by me as the firm's only attorney involved in this litigation. It does not include any time devoted to preparing this declaration or otherwise pertaining to the Joint Fee Petition. The lodestar calculation is based on my firm's historical billing rates in effect at the time services were performed. Exhibit 2 was prepared from contemporaneous time records regularly prepared and maintained by my firm. Those records have been provided to Lead Counsel and I authorize them to be submitted for inspection by the Court if necessary. The hourly rates for me included in Exhibit 2 were at the time the work was performed the usual and customary hourly rates charged for my services in similar complex litigation.

6. The total number of hours reasonably expended on this litigation by my firm from inception to May 31, 2015 is 1,325.8 hours. The total lodestar for my firm at historical rates is \$614,961. The total lodestar for my firm at current rates is \$662,900.

7. My firm did not incur any expenses in litigating this action.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 24th day of August, 2015, in Los Angeles, California.

/s/ Veronica Besmer

Veronica Besmer

Counsel for Indirect Purchaser Plaintiffs

EXHIBIT 1

Description of the Besmer Law Firm

Veronica Besmer, the founding attorney of the Besmer Law Firm, litigated antitrust cases for about a decade. She began working on antitrust class actions in 2004 as a law clerk at Alioto, Trump & Prescott, LLP. At Townsend and Townsend and Crew LLP, she worked with Gene Crew, the firm's name partner and California Antitrust Lawyer of the Year 2009, on several antitrust cases between 2006 and 2009. Ms. Besmer since participated in the *LCD* price fixing litigation and became an attorney of record on behalf of the indirect purchaser plaintiffs in the *CRT* case in 2011.

In addition to antitrust litigation, the Besmer Law Firm also provides corporate legal services to start ups and advises companies located abroad on establishing a presence and operations in the United States. Ms. Besmer received her law degree from U.C. Hastings College of the Law and received her bachelor's degree, *summa cum laude*, in business administration from the University of Southern California. She is the incoming Co-Vice President of the California State Bar's Cyberspace Law Committee.

EXHIBIT 2

EXHIBIT 2

IN RE CATHODE RAY TUBE (CRT) ANTITRUST LITIGATION; MDL NO. 1917
TIME AND LODESTAR SUMMARY
INDIRECT PURCHASER PLAINTIFFS

Firm Name	Besmer Law Firm		
Reporting Year	2011		

Name/Status	Hourly Rate	1	2	3	4	5	6	7	8	9	10	11	12	Hours	Lodestar
Veronica Besmer (P)	\$ 400.00									44.0	6.0			50.0	\$ 20,000.00
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EXHIBIT 2

IN RE CATHODE RAY TUBE (CRT) ANTITRUST LITIGATION; MDL NO. 1917
TIME AND LODESTAR SUMMARY
INDIRECT PURCHASER PLAINTIFFS

Firm Name	Besmer Law Firm		
Reporting Year	2013		

Name/Status	Hourly Rate	1	2	3	4	5	6	7	8	9	10	11	12	Hours	Lodestar
Veronica Besmer (P)	\$ 420.00	2.1				21.5				128.8	19.5			171.9	\$ 72,198.00
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		2.1	0.0	0.0	0.0	21.5	0.0	0.0	0.0	128.8	19.5	0.0	0.0	171.9	\$ 72,198.00

Firm Name	Besmer Law Firm		
Reporting Year	2014		

Name/Status	Hourly Rate	1	2	3	4	5	6	7	8	9	10	11	12	Hours	Lodestar
Veronica Besmer (P)	\$ 470.00				97.9	66.4	35.0	3.0		559.2	110.8	8.0	92.6	972.9	\$ 457,263.00
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		0.0	0.0	0.0	97.9	66.4	35.0	3.0	0.0	559.2	110.8	8.0	92.6	972.9	\$ 457,263.00

TIME AND LODESTAR SUMMARY

INDIRECT PURCHASER PLAINTIFFS

Firm Name	Besmer Law Firm		
Reporting Year	2015		

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EXHIBIT 2

IN RE CATHODE RAY TUBE (CRT) ANTITRUST LITIGATION; MDL NO. 1917

TIME AND LODESTAR SUMMARY
INDIRECT PURCHASER PLAINTIFFS

Firm Name	Besmer Law Firm		
Reporting Year	Inception through Present		

Year		1	2	3	4	5	6	7	8	9	10	11	12	Hours	Lodestar
2007		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	\$ -
2008		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	\$ -
2009		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	\$ -
2010		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	\$ -
2011		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	44.0	6.0	0.0	0.0	50.0	\$ 20,000.00
2012		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	\$ -
2013		2.1	0.0	0.0	0.0	21.5	0.0	0.0	0.0	128.8	19.5	0.0	0.0	171.9	\$ 72,198.00
2014		0.0	0.0	0.0	97.9	66.4	35.0	3.0	0.0	559.2	110.8	8.0	92.6	972.9	\$ 457,263.00
2015		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	22.7	25.2	0.0	83.1	131.0	\$ 65,500.00
		2.1	0.0	0.0	97.9	87.9	35.0	3.0	0.0	754.7	161.5	8.0	175.7	1325.8	\$ 614,961.00

STATUS:

(P) Partner
 (OC) Of Counsel
 (A) Associate
 (LC) Law Clerk
 (PL) Paralegal
 (I) Investigator

CATEGORIES:

1 Attorney Meeting/Strategy
 2 Court Appearance
 3 Client Meeting
 4 Draft Discovery Requests or Responses
 5 Deposition Preparation
 6 Attend Deposition - Conduct/Defend
 7 Document Review
 8 Experts - Work or Consult
 9 Research
 10 Motions/Pleadings
 11 Settlement
 12 Trial